

**COOK, YANCEY, KING & GALLOWAY**

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October 21, 2003

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When calling relative to this  
matter, refer to file No. 1141.

Honorable James H. Welsh  
Commissioner of Conservation  
Office of Conservation  
P. O. Box 94275  
Baton Rouge, Louisiana 70804-9275

RE: Smackover C Zone  
Reservoir B  
North Shongaloo-Red Rock Field  
Webster Parish, Louisiana

**APPLICATION FOR PUBLIC HEARING**

Dear Sir:

Will-Drill Production Co., Inc. hereby makes application pursuant to the revised rules of procedure for a public hearing to consider evidence relating to the following matters pertaining to the Smackover C Zone, Reservoir B, in the North Shongaloo-Red Rock Field, Webster Parish, Louisiana:

1. To permit Will-Drill Production Co., Inc. to drill, designate and utilize the McEachern No. 2 Well as a alternate unit well for SMK C RB SUD at the exceptional location shown on the plat attached hereto and made a part hereof, in exception to the spacing provisions of Office of Conservation Order No. 104-H-4;
2. To establish that the proposed alternate unit well is necessary to recover hydrocarbons underlying SMK C RB SUD that cannot be produced efficiently and economically from any other well located on the unit;

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3. To authorize the unit allowable for SMK C RB SUD to be recovered from the existing unit well, the proposed alternate unit well, or any combination thereof, at the discretion of the operators;
4. To recognize Will-Drill Production Co., Inc. as operator of the Will-Drill Production Co., Inc. - SMK C RB SUD; McEachern No. 2 Well;
5. To authorize Will-Drill Production Co., Inc. to report production from the SMK C RB SUD; McEachern No. 2 Well, and to authorize Cypress Operating, Inc., the operator of the SMK C RB SUD; McEachern No. 1 Well (the unit well for SMK C RB SUD), to report production from said well separately;
6. To consider and cover such other matters as the Commissioner of Conservation may deem appropriate and necessary under the circumstances.

The Smackover C Zone, Reservoir B in the North Shongaloo-Red Rock Field, Webster Parish, Louisiana, was fully defined in Office of Conservation Order No. 104-H-4, effective on and after June 24, 1986.

The subject matter of this application does not require the issuance of a pre-application notice.

Any pertinent data relating to this matter can be obtained, at the cost of the requesting party, from Mr. Mike Fulford, Will-Drill Production Co., Inc., 416 Travis Street, Suite 1200, Shreveport, Louisiana 71101, telephone number (318) 222-7464.

The Office of Conservation approved an alternate unit well for SMC C RB SUD pursuant to Office of Conservation Order No. 104-H-40, effective May 3, 2000. The well authorized by said order cannot be drilled at the approved location and it is for that reason that the Applicant is seeking authority to drill the well that is the subject of this application.

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Honorable James H. Welsh

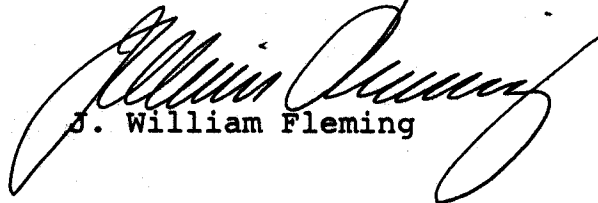
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The attached list includes the names of all Interested Owners, Represented Parties and Interested Parties known to applicant after a diligent search and a copy of this notice, with plat attached, is being sent to each such party. Pursuant to Office of Conservation regulations, such list of parties is being furnished only to the Commissioner of Conservation and to the District Manager of the Shreveport District of the Office of Conservation; however, the list of parties will be provided to any person requesting a copy of it. Also enclosed is the application fee herein.

Yours very truly,

COOK, YANCEY, KING & GALLOWAY



J. William Fleming

jwf:s

Enclosures

cc: James C. Broussard, District Manager  
Interested Owners, Represented  
Parties and Interested Parties

